

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY  
CAMDEN VICINAGE

KYLE BURNS, on behalf of himself and all others similarly situated,

Plaintiff,

v.

TD BANK, N.A.,

Defendant.

Civil Action No. 1:21-cv-18194-RBK-AMD

**NOTICE OF MOTION FOR  
PRO HAC VICE ADMISSION**

**Motion Date: December 6, 2021**

TO: ALL COUNSEL OF RECORD

**PLEASE TAKE NOTICE** that Defendant TD Bank, N.A. (“TD Bank”) will move before this Court at the Mitchell H. Cohen Building & U.S. Courthouse, 4<sup>th</sup> and Cooper Streets, Camden, NJ 08101, on December 6, 2021, for entry of an Order pursuant to Local Civil Rule 101.1(c) admitting as counsel pro hac vice in this matter Cameron R. Goodwin of the law firm of Pierce Atwood LLP.

**PLEASE TAKE FURTHER NOTICE** that TD Bank will rely upon the Certification of Cameron R. Goodwin, and the Certification of Susan M. Leming in support of the admission.

**PLEASE TAKE FURTHER NOTICE** that all Plaintiffs consent to the *pro hac vice* admission of Cameron R. Goodwin.

**PLEASE TAKE FURTHER NOTICE** that a Proposed Order granting *pro hac vice* admission to Cameron R. Goodwin is attached.

Dated: November 12, 2021

Respectfully submitted,  
**BROWN & CONNERY, LLP**

/s/ Susan M. Leming

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